

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ANDREINA ROSARIO,  
a/k/a "Andreina Herrera,"

Defendant.

INFORMATION

24 Cr. 336

COUNTS ONE THROUGH FOUR


(Aiding and Assisting Preparation of False and Fraudulent U.S. Individual Income Tax Returns)

The United States Attorney charges:

On or about the dates set forth below, in the Southern District of New York and elsewhere, ANDREINA ROSARIO, a/k/a "Andreina Herrera," the defendant, willfully and knowingly aided and assisted in, and procured, counseled, and advised the preparation and presentation, to the Internal Revenue Service, of returns, affidavits, claims, and other documents, to wit, U.S. Individual Income Tax Returns, Forms 1040, and accompanying forms and schedules, for the taxpayers listed below, and the tax years listed below, which were fraudulent and false as to material matters, in that, among other things, the returns fabricated and falsely overstated items such as charitable expenses, (Schedule A deductions), medical expenses, and eligibility for head of household status, as set forth below:

| Counts | Taxpayer   | Tax Years | Summary of Fabrications and/or Overstatements   | Approx. Filing Date | Approx. Tax Loss |
|--------|------------|-----------|---|---------------------|------------------|
| 1      | Taxpayer-1 | 2017      | False head of household status<br>False sales tax paid<br>False charitable contributions<br>False medical expenses<br>False job expenses<br>False investment expenses | February 21, 2018   | \$5,062          |
| 2      | Taxpayer-1 | 2018      | False head of household status<br>False sales tax paid<br>False charitable contributions  | January 28, 2019    | \$2,645          |
| 3      | Taxpayer-2 | 2019      | False head of household status<br>False childcare expenses  | March 30, 2021      | \$2,176          |
| 4      | Taxpayer-2 | 2020      | False head of household status<br>False childcare expenses  | March 30, 2021      | \$1,695          |

(Title 26, United States Code, Section 7206(2).)

  
 DAMIAN WILLIAMS  
 United States Attorney